UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CENTAURO LIQUID OPPORTUNITIES MASTER FUND, L.P.,

Plaintiff,

vs.

ALESSANDRO BAZZONI, CINQUE TERRE FINANCIAL GROUP, LTD., CT ENERGIA LTD., and CT ENERGIA Ltd. d/b/a, ELEMENTO LTD.,

Defendants.

Case No. 15-cv-9003 (LTS)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed: (a) Declaration of Matthew G. DeOreo, dated September 28, 2018, (b) the Local Rule 56.1 Statement of Defendants Alessandro Bazzoni and CT Energia Ltd. ("Defendants"), dated September 28, 2018, and (c) the accompanying Memorandum of Law, dated September 28, 2018, Defendants will move this Court, before the Honorable Laura Taylor Swain, U.S.D.J., in the United States Courthouse, Southern District of New York, 500 Pearl St., New York, N.Y. 10007, on such day when counsel may be heard, for an Order, pursuant to Fed. R. Civ. P. 56, dismissing with prejudice the Amended Complaint of Plaintiff Centauro Liquid Opportunities Master Fund, L.P. as to Defendants, with such other and further relief as this Court deems just and proper.

Pursuant to Section 2(b)(ii) of the Court's Individual Practices, counsel for the moving Defendants conferred with counsel for Plaintiff and used their best efforts to resolve informally the matters raised in this motion, including the exchange of written communications and a telephone conference.

Dated: New York, New York September 28, 2018

Yours, etc.,

TACOPINA & SEIGEL

By: /s/ Matthew G. DeOreo

Joseph Tacopina, Esq. Chad D. Seigel, Esq. Matthew G. DeOreo, Esq. 275 Madison Ave., Fl. 35 New York, New York 10016

Tel: (212) 227-8877 Fax: (212) 619-1028

Attorneys for Defendants Alessandro Bazzoni

and CT Energia Ltd.

To:

All Counsel *Via ECF*